

FY'95 CORRECTIVE ACTION SITE MANAGEMENT PLANS

1. SECO/HUSSMAN
Washington, Missouri

Current Status

In FY'93 EPA issued a unilateral 3008(h), the second in the region, to Hussman to complete work necessary to characterize the hydrogeology and contamination at the site. This work was not accomplished with completion of work on the initial 3008(h) which was issued in 1989. The facility completed the work necessary under this order in 1992 and submitted their final report which showed the inadequacies.

EPA and Hussman negotiated a Modification to the original Consent Agreement in order to get additional wells installed to better define the rate and extent of contaminant migration. The effective date of this Modification is 8-10-94. This Modification causes the implementation of the January 1993 Revised Remedial Workplan. This Workplan calls for the installation of additional groundwater monitoring wells with sampling. The installation of the new wells and the first sampling events should be accomplished by Christmas of 1994. They have allowed themselves ten weeks to draft the report on the well installation. This period comprises Phase I of the Workplan. Any work to be accomplished beyond this will depend upon the results of sampling.

Oversight Strategy

EPA will receive and re-review bimonthly progress reports until the additional work required in the Revised Remedial Workplan is completed. After that period we will be getting quarterly reports. We should be getting a report on this work early in the new year. The new wells will be monitored quarterly and the old wells will be monitored semi annually.

The results of the work in Phase I will determine if Phase II, Subsequent Work, effort is necessary and will provide the basis for design of Phase II. Phase II is written into the Amendment and will be developed if further onsite exploration is warranted.

If offsite investigation and/or remediation should be necessary EPA will have to use other legal authority to involve the current owner/operator (A. Middleby Corp.) as Hussman has made it quite clear that they will not be held solely responsible and regional counsel believes that this is the appropriate course of action.



Cynthia L. Hutchison

FY'94 Oversight Activities

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| 1. Site visit to review operations. | Q1 |
| 2. Review bimonthly progress reports (x6). | Q1, Q2, Q3, Q4 |
| 3. Review of Phase I Report. | Q2 or Q3 |

Resource Needs

No contract resources are anticipated to be needed for FY'95. GEOL (Bill Lowe) and I will need to review and approve the Phase I Final Report.

Site visit:

RCOM	0 days
GEOL	5 days

Bi-monthly progress reports:

RCOM	1 day
GEOL	1 day

Phase I Final Report Review:

RCOM	5 days
GEOL	5 days

Phase II new work development:

Resource needs unknown at this time (dependent on results of Phase I.)